

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
CASE NOS. 5:15cv57-RLV; 3:15CV211-RLV**

<b>ROMONA WINEBARGER,</b>	)
<b>And REX WINEBARGER,</b>	)
<b>Plaintiffs,</b>	)
	)
<b>v.</b>	)
	)
<b>BOSTON SCIENTIFIC</b>	)
<b>CORPORATION,</b>	)
<b>Defendant.</b>	)

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<b>MARTHA CARLSON,</b>	)
<b>Plaintiffs,</b>	)
	)
<b>v.</b>	)
	)
<b>BOSTON SCIENTIFIC</b>	)
<b>CORPORATION,</b>	)
<b>Defendant.</b>	)

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**DEFENDANT BOSTON SCIENTIFIC CORPORATION'S  
DEPOSITION DESIGNATIONS**

Defendant Boston Scientific Corporation ("Boston Scientific") hereby submits its deposition designations for the above-referenced cases.

Boston Scientific reserves the right to amend, supplement, or withdraw its designations at any time before or during trial. Furthermore, Boston Scientific reserves the right to amend, supplement, or withdraw its designations subject to the Court's rulings on evidentiary matters in the above-referenced cases including, but not limited to, pending motions *in limine*. Boston Scientific also reserves the right to object to any documents or testimony that Plaintiffs may offer at trial.

Name of Deponent	Date of Deposition	Citation
Janice Connor	08/13-14/2013	461:19-464:1
		464:8-475:22
		476:1-478-2
		491:1-12
		495:10-498:18
		498:23-499:3
		501:5-503:5
		567:1-14
Boston Scientific submits that the following exhibit is included in the designated deposition testimony of Janice Connor: <b>Deposition Exhibit 534.</b>		

Name of Deponent	Date of Deposition	Citation
Janice Connor	04/21/2015	432:11-22
		436:25-439:18
		439:24-441:15
		442:4-447:23
		450:3-451:11
		451:13-452:10
		452:13-453:10
		454:20-456:12
		458:25-460:11
		460:24-461:9
		462:9-465:1
		468:6-15
		468:21-469:4
		469:10-471:2

		472:6-473:19
		473:22-474:5
		474:9-475:11
		476:20-478:20
		478:25-479:4
		479:9-481:5
		481:14-21
		482:4-485:23
		486:4-487:14
		494:9-16
		495:2-500:2
		501:6-10
		551:9-552:14
		564:23-567:18
		567:22-568:1
		568:9-569:19
		569:23-572:13
		572:17-573:13
		577:18-21
		577:24-578:17
		578:19-579:2
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Janice Connor: <b>Deposition Exhibits 1328, 1329, 1330, 1332, 1339, 1344, and 1345.</b>		

Name of Deponent	Date of Deposition	Citation
James Goddard	03/28-29/2013	18:7-9
		26:4-5
		271:1-2

		481:3-485:4
		487:16-488:7
		488:13-495:2
		502:17-507:1
		507:4-9
		507:11-508:8
		525:2-22
		526:5-527:16
		530:13-531:12
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Jim Goddard: <b>Deposition Exhibits 43 and 55.</b>		

Name of Deponent	Date of Deposition	Citation
Roger Goldberg, M.D.	12/13/13	413:20-440:15
		442:14-444:21
		445:9-452:14
		453:9-459:13
		460:7-462:11
		462:13-463:8
		463:15-464:11
		473:15-476:4
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Roger Goldberg, M.D.: <b>Deposition Exhibits 786, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, and 837.</b>		

Name of Deponent	Date of Deposition	Citation
Alfred Intoccia, Jr.	07/31/2013	16:15-16
		29:9-10

		310:1-13
		310:23-311:7
		311:16-317:4
		318:4-18
		320:11-321:8
		321:15-20
		322:2-16
		322:21-326:19
		327:17-336:17
		337:3-10
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Alfred Intoccia, Jr.: <b>Deposition Exhibits 451 and 471.</b>		

Name of Deponent	Date of Deposition	Citation
Todd McCaslin	01/30/2014	77:18-20
		78:3-79:7
		82:18-83:3
		96:17-21
		97:4-14

Name of Deponent	Date of Deposition	Citation
Dennis Miller, M.D.	11/15/2013	15:13-20
		458:9-461:16
		462:3-464-22
		465:17-477:2
		477:20-478:23
		480:5-482:20

		491:16-492:9
		493:13-497:16
		498:23-499:18
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Dennis Miller, M.D.: <b>Deposition Exhibits 1037 and 1038.</b>		

Name of Deponent	Date of Deposition	Citation
Robert Miragliuolo	04/24-25/2013	52:2-53:10
		450:17-453:11
		455:10-16
		456:16-457:14
		466:6-19
		466:21-467:2
		467:4-10
		472:7-473:6
		473:12-475:6
		480:1-4
		480:6-13
		507:4-19
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Robert Miragliuolo: <b>Deposition Exhibits 141, 193, and 195.</b>		

Name of Deponent	Date of Deposition	Citation
John Sherry	03/12-13/2013	16:22-17:6
		66:11-67:8
		68:5-11
		68:14-20
		69:1

		69:9-23
		74:4-75:16
		78:13-16
		78:18-79:21
		79:23-80:3
		93:1-13
		231:18-233:8
		551:11-553:3
		553:8-14
		553:22-555:17
		557:2-6
		557:9-23
		561:8-562:12
		562:15-566:16
		566:21-568:10
		568:19-571:23
		572:2-576:18
		577:4-17
		579:1-13
Boston Scientific submits that the following exhibit is included in the designated deposition testimony of John Sherry: <b>Deposition Exhibit 66.</b>		

Name of Deponent	Date of Deposition	Citation
Frank Zakrzewski	3/7/2014	37:8-12
		41:2-42:4
		44:3-11
		45:3-12
		45:24-46:11

		47:8-21
		49:16-24
		50:11-51:2
		51:9-15
		51:22-52:9
		52:17-54:22
		54:24-55:1
		64:4-65:1
		65:3-66:11
		66:13
		68:23-69:2
		69:18-71:8
		71:13-14
		78:10-13
		107:8-10
		107:15-20
		141:15-21
		142:10-143:6
		143:11-144:1
		144:4-8
		167:11-168:4
		168:20-24
		173:13-19
		177:16-19
		178:7-19
		178:24-180:10
		183:9-11
		183:13-14
		184:11-14



		187:21-188:12
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Frank Zakrzewski: <b>Deposition Exhibits 3, 4, 5, 7, 8, and 22.</b>		

Name of Deponent	Date of Deposition	Citation
Steven H. Schneider, M.D.	11/19/2014	5:5-8:18
		16:19-17:20
		18:21-21:9
		23:19-29:20
		29:24-38:16
		38:18-39:22
		40:1-40:12
		40:14-43:18
		44:7-46:4
		46:6-49:13
		50:18-56:1
		56:3-12
		56:15
		56:17-57:5
		57:8
		57:23-58:5
		58:8-59:14
		59:17
		59:19-60:7
		61:5-63:1
		65:12-15
		68:12-17
		68:20-69:15

		69:18-24
		70:3
		70:5-6
		70:8-15
		70:18
		70:21-71:7
		72:11-17
		72:19
		74:5-75:20
		75:23
		76:1-4
		76:13-16
		76:18
		76:20-77:4
		77:8-79:24
		84:6-18
		87:1-2
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Steven H. Schneider, M.D.: <b>Deposition Exhibits 1, 2, and 3.</b>		

Name of Deponent	Date of Deposition	Citation
Michael J. Kennelly, M.D.	07/02/2014	7:3-10:3
		12:14-20
		14:14-16:8
		17:3-21:12
		22:8-39:4
		39:11-55:1
		55:5-8

		55:11-12
		55:14-18
		55:22-57:2
		58:18-59:21
		61:14-17
		61:23-64:3
		64:6-66:5
		67:4-73:23
		76:19-80:24
		81:19-82:20
		82:24-85:6
		85:14-86:23
		87:20-89:24
		93:3-100:10
		100:22-102:7
		102:19-112:4
		112:7
		112:9-119:25
		120:11-121:4
		121:23-122:19
		123:5-7
		123:10-132:2
		132:4-11
		132:13-147:17
		147:19—148:7
		148:11-152:3
		152:6-13
		152:16-21
		152:24

		153:1-4
		153:8-10
		153:13
		153:15-17
		153:20
		153:22-25
		154:2
		154:6-10
		154:13-18
		154:21-22
		154:24
		155:1-3
		155:7-9
		155:13-14
		155:18-20
		155:24-156:3
		156:7-15
		156:17-157:5
		172:13-17
		172:19-20
		176:12-19
		202:18-203:13
		203:19-21
		203:23-205:24
		206:2
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Michael J. Kennelly, M.D.: <b>Deposition Exhibits 2, 3, 4, 5, and 8.</b>		

<b>Name of Deponent</b>	<b>Date of Deposition</b>	<b>Citation</b>
Carolyn Margaret Coryell, M.D.	10/17/2014	4:4-5:23
		6:7-7:15
		7:22-8:19
		9:1-12:9
		12:17-14:19
		15:11-16:2
		16:25-17:3
		18:4-19:10
		20:16-23
		23:6-9
		24:19-22
		25:3-6
		25:25-27:1
		27:11-25
		28:1-3
		28:5-29:14
		30:15-32:6
		32:8-12
		32:19-33:2
		33:14-18
		34:17-19
		35:8-21
		37:10-20
		38:4-6
		38:8-39:4
		39:6-40:5
		41:5-24

		42:1-14
		43:2-44:2
		44:4-8
		44:10-19
		44:21-22
		45:11-17
		45:22-47:6
		47:8-16
		47:18-48:13
		48:15-22
		48:24-49:7
		49:9-25
		50:2-14
		50:16-51:13
		51:21-23
		52:5-9
		52:11-13
		52:15-53:1
		53:3-6
		53:8-54:16
		54:18-24
		55:1-4
		55:6
		56:25-57:3
		70:2-4
		72:10-73:14
		73:18-22
		73:25-75:1
		75:22-76:14

		82:1-13
		85:5-12
		86:13-24
		88:16-23
		89:10-90:10
		108:3-109:15
		109:17-111:23
Boston Scientific submits that the following exhibits are included in the designated deposition testimony of Carolyn Margaret Coryell, M.D.: <b>Deposition Exhibits 1, 2, 3, 4, 5, and 8.</b>		

Dated: 06/15/2015

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2015, I caused the foregoing document to be electronically filed with the Clerk of the court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive services in this matter.

s/ Leslie C. Packer \_\_\_\_\_

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